

UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

Thurgood Marshall U.S. Courthouse 40 Foley Square, New York, NY 10007 Telephone: 212-857-8500

MOTION INFORMATION STATEMENT

Docket Number(s): 24-2333

Caption [use short title]

Motion for: 1. Withdraw as counselUnited States v. Reyes2. Hold oral argument in abeyance pending new
counsel, for a reasonable time

Set forth below precise, complete statement of relief sought:

Permitting the law firm of Mazzola Lindstrom, LLP
and attorney Jean-Claude Mazzola to withdraw
as counsel, based upon express termination
by the defendants-appellants; holding oral argument
in abeyance for a reasonable timeMOVING PARTY: Juan and Catherine ReyesOPPOSING PARTY: United States☐ Plaintiff☒ Defendant☒ Appellant/Petitioner☐ Appellee/RespondentMOVING ATTORNEY: Jean-Claude MazzolaOPPOSING ATTORNEY: Robert J. Wille

[name of attorney, with firm, address, phone number and e-mail]

Mazzola Lindstrom LLPUnited States Department of Justice -- Tax Division1350 Ave of the Americas, NYCWashington DC646.250.6666 jeanclaude@mazzolalindstrom.com 202.514.5573 , robert.j.wille@usdoj.govCourt- Judge/ Agency appealed from: Margot Brodie, USDJ-EDNY

Please check appropriate boxes:

Has movant notified opposing counsel (required by Local Rule 27.1):

☒ Yes ☐ No (explain):FOR EMERGENCY MOTIONS, MOTIONS FOR STAYS AND
INJUNCTIONS PENDING APPEAL:

Has this request for relief been made below?

☐ Yes ☒ No *N/A*

Has this relief been previously sought in this court?

☐ Yes ☒ No

Opposing counsel's position on motion:

* ☒ Unopposed ☒ Opposed ☐ Don't Know

Does opposing counsel intend to file a response:

☒ Yes ☐ No ☐ Don't Know

Requested return date and explanation of emergency:

8/29/2025 -- Reason for emergency is that the defendants-appellants
have terminated counsel, Mazzola Lindstrom as of 9:35pm on 8/27/25, as
they wish to retain new counsel to orally argue the appeal, scheduled for
9/2/25 at 2pm

*DOJ Attorney Robert Wille advises that the government does not oppose
this firm's withdrawal as counsel, but will oppose, and submit papers
in opposition to
holding oral argument
in abeyance
pending retention
of new counsel!*

Is the oral argument on motion requested?

☐ Yes ☒ No (requests for oral argument will not necessarily be granted)

Has the appeal argument date been set?

☒ Yes ☐ No If yes, enter date:9/2/25

Signature of Moving Attorney:

/s/ Jean-Claude Mazzola Date: 8/28/25

Service:

☒ Electronic☐ Other [Attach proof of service]